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Counsel for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of themselves and
all others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF GOOGLE LLC'S
OBJECTIONS TO SPECIAL MASTER'S
REPORT AND RECOMMENDATION ON
REFERRED DISCOVERY ISSUES
(PRESERVATION PLAN)**

Judge: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I
5 could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google
7 LLC’s Administrative Motion to Seal portions of Google’s Objections to Special Master’s Report
8 and Recommendation on Referred Discovery Issues (Preservation Plan) (“Google’s Objections”).
9 In making this request, Google has carefully considered the relevant legal standard and policy
10 considerations outlined in Civil Local Rule 79-5. Google makes this request with the good faith
11 belief that the information sought to be sealed consists of Google’s confidential and proprietary
12 information and that public disclosure could cause competitive harm.

13 3. The information requested to be sealed contains Google’s confidential and
14 proprietary information regarding highly sensitive features of Google’s internal systems and
15 operations, including various types of Google’s internal projects, data signals, and logs and their
16 proprietary functionalities, that Google maintains as confidential in the ordinary course of its
17 business and is not generally known to the public or Google’s competitors.

18 4. Such confidential and proprietary information reveals Google’s internal strategies,
19 system designs, and business practices for operating and maintaining many of its important services,
20 and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-
21 3.

22 5. Public disclosure of such confidential and proprietary information could affect
23 Google’s competitive standing as competitors may alter their identifier system designs and practices
24 relating to competing products. It may also place Google at an increased risk of cyber security
25 threats, as third parties may seek to use the information to compromise Google’s data sources,
26 including data logs, internal data structures and internal identifier systems.

27 6. For these reasons, Google respectfully requests that the Court order Google’s
28 Objections to be filed under seal.

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2 I declare under penalty of perjury of the laws of the United States that the foregoing is true
3 and correct. Executed in San Francisco, California on April 15, 2022.
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5 DATED: April 15, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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8 By /s/ Jonathan Tse
Jonathan Tse

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10 *Attorney for Defendant*
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